

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
AT LAW AND IN ADMIRALTY

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$22,606.00 IN UNITED  
STATES CURRENCY, and

ONE 2017 LINCOLN MKZ, VEHICLE  
IDENTIFICATION NUMBER (VIN)  
3LN6L5E95HR614085, WITH ALL  
APPURTENANCES AND ATTACHMENTS  
THEREON,

Defendants.

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**VERIFIED COMPLAINT FOR CIVIL FORFEITURE IN REM**

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The United States of America, by its attorneys, Matthew D. Krueger, United States Attorney for the Eastern District of Wisconsin, and Scott J. Campbell, Assistant United States Attorney for this district, alleges the following in accordance with Supplemental Rule G(2) of the Federal Rules of Civil Procedure:

**Nature of the Action**

1. This is a civil action to forfeit properties to the United States of America, under 21 U.S.C. §§ 881(a)(4) and (6), for violations of 21 U.S.C. § 841(a)(1).

**The Defendants In Rem**

2. The defendant approximately \$22,606.00 in United States currency was seized on or about October 25, 2018, from Cardale Bland at or near 7XXX West Marine Drive, Milwaukee, Wisconsin.

3. The defendant one 2017 Lincoln MKZ bearing vehicle identification number (VIN) 3LN6L5E95HR614085 was seized on or about October 25, 2018, from Cardale Bland at or near 7XXX West Marine Drive, Milwaukee, Wisconsin.

4. The defendant properties are presently in the custody of the United States Marshal Service in Milwaukee, Wisconsin.

### **Jurisdiction and Venue**

5. This Court has subject matter jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

6. This Court has *in rem* jurisdiction over the defendant properties under 28 U.S.C. § 1355(b).

7. Venue is proper in this district under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district.

### **Basis for Forfeiture**

8. The defendant approximately \$22,606.00 in United States currency is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6) because it was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

9. The defendant one 2017 Lincoln MKZ bearing vehicle identification number (VIN) 3LN6L5E95HR614085 is subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(4) because it was used, or intended to be used, to transport, or to facilitate the transportation, sale, receipt, possession, or concealment of a controlled substance in violation of 21 U.S.C. § 841(a)(1).

## **Facts**

10. Heroin is a Schedule I controlled substance under 21 U.S.C. § 812.
11. Marijuana is a Schedule I controlled substance under 21 U.S.C. § 812.
12. Fentanyl is a Schedule II controlled substance under 21 U.S.C. § 812.
13. Cocaine is a Schedule II controlled substance under 21 U.S.C. § 812.
14. Oxycodone is a Schedule II controlled substance under 21 C.F.R. § 1308.
15. Lactose is used by drug dealers to cut or dilute controlled substances.

### **Controlled buys of heroin, or a mixture of heroin and fentanyl, from Cardale Bland**

16. On August 28, 2018, at approximately 1:06 p.m., a Wisconsin Department of Justice – Division of Criminal Investigation confidential informant (“CI”) purchased approximately 2.2 grams of heroin from Cardale Bland for \$390 in pre-recorded buy money at or near 7157 North 46<sup>th</sup> Street in Milwaukee, Wisconsin.

17. On September 13, 2018, at approximately 4:35 p.m., the CI purchased approximately 3.55 grams of heroin from Cardale Bland for \$520 in pre-recorded buy money at or near a Marathon gas station located at 10501 West Brown Deer Road in Milwaukee, Wisconsin (the “Marathon station”).

18. On September 25, 2018, at approximately 4:03 p.m., the CI purchased approximately 3.78 grams of a mixture of heroin and fentanyl from Cardale Bland for \$560 in pre-recorded buy money at or near the Marathon station.

19. On October 22, 2018, at approximately 3:34 p.m., the CI purchased approximately 4.27 grams of a mixture of heroin and fentanyl from Cardale Bland for \$650 in pre-recorded buy money at or near the Marathon station as follows:

- A. On October 22, 2018, at approximately 3:15 p.m., during a telephone conversation to set up the drug deal, Bland instructed the CI to meet Bland at a location – namely, the Marathon station – for the purchase of heroin.

- B. At about 3:29 p.m., the CI drove into the Marathon station parking lot and parked on the west side.
- C. At about 3:33 p.m., Cardale Bland drove into the Marathon station parking lot in the defendant 2017 Lincoln MKZ and parked on the north side.
- D. The license plates on the defendant 2017 Lincoln MKZ – ABE3XXX – were registered to Cardale Bland.
- E. Cardale Bland was the driver and sole occupant of the defendant 2017 Lincoln MKZ.
- F. The CI then exited CI's vehicle and entered the front passenger side of the defendant 2017 Lincoln MKZ.
- G. While inside the defendant 2017 Lincoln MKZ, Bland handed to CI three clear plastic knotted corner-cut baggies containing a mixture of heroin and fentanyl with a total weight of approximately 3.02 grams.
- H. Bland then took an additional approximately 1.25 grams in loose chunks of a heroin and fentanyl mixture out of another baggie containing a larger amount of that mixture and handed the approximately 1.25 grams to the CI.
- I. Bland handed to the CI a total of approximately 4.27 grams of the heroin and fentanyl mixture.
- J. The CI then handed \$650 in pre-recorded buy money to Bland as payment for the approximately 4.27 grams of a mixture of heroin and fentanyl.
- K. The CI asked Bland about purchasing a larger amount of heroin from Bland in the future, and Bland agreed to do so.
- L. After the drug transaction, at approximately 3:35 p.m., the CI exited the defendant 2017 Lincoln MKZ and returned to CI's vehicle.

#### **October 6, 2018 traffic stop and arrest of Cardale Bland**

20. On October 6, 2018, Milwaukee Police Department officers conducted a traffic stop on an Infinity Q50 for a suspended license plate registration. The vehicle and plates were registered to Cardale Bland.

21. Cardale Bland was the driver of the Infinity, and three minor females were passengers.

22. Officers approached Bland's vehicle and spoke with Bland, who remained in the driver's seat. While speaking with Bland, one officer saw marijuana buds and flakes on Bland's lap, and asked Bland to exit the vehicle. After Bland exited the vehicle, officers saw a corner cut bag of drugs on the driver's seat where Bland had been sitting.

23. Officers attempted to handcuff Bland, but Bland resisted arrest and refused to comply with officers' orders. Ultimately, one officer deployed a taser on Bland, who was then taken into custody.

24. Below are some of the items that were inside the Infinity on October 6, 2018:

- A. A bag on the driver's seat contained 13 individually wrapped, clear plastic, corner cut baggies containing a total of 8.56 grams of heroin.
- B. A digital scale was inside the driver's door compartment.
- C. A total of four cell phones were in the vehicle.

25. On Bland's person, officers found a baggie containing 3.79 grams of marijuana, along with \$545 – which currency is not a defendant in this case.

26. On October 9, 2018, Cardale Bland was charged in Milwaukee County Circuit Court, Case No. 18CF4831, with (1) possession of heroin with intent to deliver – second and subsequent offense, and (2) resisting an officer.

27. On October 10, 2018, Cardale Bland posted \$2,500 cash bond in Case No. 18CF4831 and was released from custody.

**October 25, 2018 execution of search warrants at Cardale Bland's residence and on the defendant 2017 Lincoln MKZ**

28. On October 25, 2018, officers executed a search warrant at the residence of Cardale Bland, 7XXX W. Marine Drive, Milwaukee, Wisconsin ("Bland's residence").

29. Present at Bland's residence during execution of the search warrant were Cardale Bland, an individual having the initials B.H., and two minor children.

30. Below are some of the items inside Bland's residence on October 25, 2018.

- A. In the dining room: A hydraulic press labeled "brick press."
- B. In the living room:
  - i. Two bags containing a total of 1.47 grams of marijuana, and
  - ii. One cell phone.
- C. In the kitchen:
  - i. A digital pocket scale with suspected drug residue,
  - ii. A baggie with four 15mg Oxycodone pills,
  - iii. A bag of Lactose,
  - iv. One cell phone,
  - v. Corner cut baggies and baggies, and
  - vi. Blender cups with suspected drug residue.
- D. In the master bedroom:
  - i. On the dresser: a cell phone.
  - ii. In a pair of men's pants on the floor by the bed:
    - a. Approximately \$406 in United States currency,
    - b. A cell phone that was assigned the phone number used by the CI to set up the drug buys with Cardale Bland, and
    - c. A bag containing: (1) 15 clear plastic corner cut baggies containing a mixture of heroin and fentanyl totaling 9.84 grams, and (2) 8 clear plastic corner cut baggies containing cocaine base totaling 2.96 grams.
  - iii. In the closet containing men's clothing:
    - a. A Milwaukee County Sheriff's Office property log sheet for the booking of Cardale Bland dated October 7, 2018,
    - b. A semi-automatic handgun with an extended magazine loaded with one round in the chamber and 27 rounds in the magazine,
    - c. A second semi-automatic handgun – which had been reported as stolen with Greenfield Police Department – with an extended magazine loaded with 30 rounds,
    - d. One cell phone,

e. A Gucci bag containing approximately \$23,000 in United States currency, and

f. Identifiers for Cardale Bland.

31. A total of approximately \$23,406 was seized from Bland's residence – approximately \$406 from the men's pants and approximately \$23,000 from the Gucci bag.

32. The seized approximately \$23,406 included \$800 in pre-recorded bills that the CI had paid to Cardale Bland in exchange for heroin, or a mixture of heroin and fentanyl, as follows:

- A. \$220 (11-\$20 bills) from the August 28, 2018 controlled buy,
- B. \$280 (14-\$20 bills) from the September 13, 2018 controlled buy, and
- C. \$300 (10-\$20 bills and 1-\$100 bill) from the October 22, 2018 controlled buy.

33. The defendant approximately \$22,606 in United States currency is comprised of the seized approximately \$23,406 after subtracting the \$800 in buy money.

34. Denominations of the defendant approximately \$22,606 were 39-\$100 bills, 68-\$50 bills, 765-\$20 bills, 1-\$5 bill, and 1-\$1 bill.

35. Officers also executed a search warrant on the defendant 2017 Lincoln MKZ, which was parked in the driveway at Bland's residence. Inside the defendant vehicle were identifiers for Cardale Bland and one cell phone.

#### **Cardale Bland's October 9, 2018 State Drug Charges**

36. On October 9, 2018, Cardale Bland was charged in Milwaukee County Circuit Court, Case No. 18CF4831 with (1) possession of heroin with intent to deliver – second and subsequent offense, and (2) resisting an officer.

37. A jury trial in Case No. 18CF4831 is scheduled for September 30, 2019.

### **Cardale Bland's October 26, 2018 State Drug Charges**

38. On October 26, 2018, Cardale Bland was charged in Milwaukee County Circuit Court, Case No. 18CF5127, with (1) four counts of manufacture/deliver heroin, (2) one count of possession of heroin with intent to deliver, (3) one count of maintaining a drug trafficking place, (4) two counts of possession of a firearm by a felon, and (5) two counts of bail jumping.

39. A jury trial in Case No. 18CF5127 is scheduled for September 30, 2019.

### **Warrant for Arrest In Rem**

40. Upon the filing of this complaint, the plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the defendant properties pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

### **Claims for Relief**

41. The plaintiff alleges and incorporates by reference the paragraphs above.

42. By the foregoing and other acts, the defendant approximately \$22,606.00 in United States currency was used or intended to be used in exchange for controlled substances, represents proceeds of trafficking in controlled substances, or was used or intended to be used to facilitate a violation of 21 U.S.C. § 841(a)(1).

43. The defendant approximately \$22,606.00 in United States currency is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(6).

44. By the foregoing and other acts, the defendant 2017 Lincoln MKZ bearing vehicle identification number (VIN) 3LN6L5E95HR614085 was used, or intended to be used, to transport, or to facilitate the transportation, sale, receipt, possession, or concealment of a controlled substance in violation of 21 U.S.C. § 841(a)(1).

45. The defendant 2017 Lincoln MKZ bearing vehicle identification number (VIN) 3LN6L5E95HR614085 is therefore subject to forfeiture to the United States of America under 21 U.S.C. § 881(a)(4).

WHEREFORE, the United States of America prays that a warrant of arrest for the defendant properties be issued; that due notice be given to all interested parties to appear and show cause why the forfeiture should not be decreed; that judgment declare the defendant properties to be condemned and forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other and further relief as this Court may deem just and equitable, together with the costs and disbursements of this action.

Dated at Milwaukee, Wisconsin, this 6<sup>th</sup> day of June, 2019.

Respectfully submitted,

MATTHEW D. KRUEGER  
United States Attorney

By: s/SCOTT J. CAMPBELL  
SCOTT J. CAMPBELL  
Assistant United States Attorney  
Scott J. Campbell Bar Number: 1017721  
Attorney for Plaintiff  
Office of the United States Attorney  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 530  
Milwaukee, Wisconsin 53202  
Telephone: (414) 297-1700  
Fax: (414) 297-1738  
E-Mail: [scott.campbell@usdoj.gov](mailto:scott.campbell@usdoj.gov)

## **Verification**

I, Matthew Cooper, hereby verify and declare under penalty of perjury that I am a Task Force Officer with the Drug Enforcement Administration (DEA) in Milwaukee, that I have read the foregoing Verified Complaint for Civil Forfeiture *in rem* and know the contents thereof, and that the factual matters contained in paragraphs 10 through 35 of the Verified Complaint are true to my own knowledge.

The sources of my knowledge and information are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Task Force Officer with DEA.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.

Date: 06-06-2019

s/MATTHEW COOPER

Matthew Cooper  
Task Force Officer  
Drug Enforcement Administration

**CIVIL COVER SHEET**

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

Place an "X" in the appropriate box:  Green Bay Division  Milwaukee Division

**I. (a) PLAINTIFFS**

UNITED STATES OF AMERICA

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)(c) Attorneys (Firm Name, Address, and Telephone Number)  
Scott J. Campbell, AUSA  
US Attorney's Office, #530 Federal Building  
517 E. Wisconsin Avenue, Milwaukee, WI 53202 (414-297-1700)**DEFENDANTS**APPROXIMATELY \$22,606.00 IN UNITED STATES CURRENCY,  
et al.County of Residence of First Listed Defendant  Milwaukee

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> 1 U.S. Government Plaintiff | <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)          |
| <input type="checkbox"/> 2 U.S. Government Defendant            | <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III) |

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance	<b>PERSONAL INJURY</b>	<b>PERSONAL INJURY</b>	<input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881	<input type="checkbox"/> 375 False Claims Act
<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 365 Personal Injury - Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158	<input type="checkbox"/> 400 State Reapportionment
<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 367 Health Care/ Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157	<input type="checkbox"/> 410 Antitrust
<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<b>PROPERTY RIGHTS</b>	<input type="checkbox"/> 430 Banks and Banking
<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 330 Federal Employers' Liability	<input type="checkbox"/> 370 Other Fraud	<input type="checkbox"/> 820 Copyrights	<input type="checkbox"/> 450 Commerce
<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 340 Marine	<input type="checkbox"/> 371 Truth in Lending	<input type="checkbox"/> 830 Patent	<input type="checkbox"/> 460 Deportation
<input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 380 Other Personal Property Damage	<input type="checkbox"/> 840 Trademark	<input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations
<input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits	<input type="checkbox"/> 350 Motor Vehicle	<input type="checkbox"/> 385 Property Damage Product Liability	<b>LABOR</b>	<input type="checkbox"/> 480 Consumer Credit
<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 355 Motor Vehicle Product Liability	<input type="checkbox"/> 390 Other Fraud	<b>SOCIAL SECURITY</b>	<input type="checkbox"/> 490 Cable/Sat TV
<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 360 Other Personal Injury	<input type="checkbox"/> 391 Truth in Lending	<input type="checkbox"/> 861 HIA (1395ff)	<input type="checkbox"/> 850 Securities/Commodities/ Exchange
<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 362 Personal Injury - Med. Malpractice	<input type="checkbox"/> 392 Other Personal Product Liability	<input type="checkbox"/> 862 Black Lung (923)	<input type="checkbox"/> 890 Other Statutory Actions
<input type="checkbox"/> 196 Franchise			<input type="checkbox"/> 863 DIWC/DIWW (405(g))	<input type="checkbox"/> 891 Agricultural Acts
			<input type="checkbox"/> 864 SSID Title XVI	<input type="checkbox"/> 893 Environmental Matters
			<input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 895 Freedom of Information Act
				<input type="checkbox"/> 896 Arbitration
				<input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision
				<input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	FEDERAL TAX SUITS	
<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence	<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)	
<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 441 Voting	<b>Habeas Corpus:</b>	<input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	
<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 442 Employment	<input type="checkbox"/> 530 General		
<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 443 Housing/ Accommodations	<input type="checkbox"/> 535 Death Penalty		
<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 445 Amer. w/Disabilities - Employment	<input type="checkbox"/> 540 Mandamus & Other		
<input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 446 Amer. w/Disabilities - Other	<input type="checkbox"/> 550 Civil Rights		
	<input type="checkbox"/> 448 Education	<input type="checkbox"/> 555 Prison Condition		
		<input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement		
		<input type="checkbox"/> 462 Naturalization Application		
		<input type="checkbox"/> 463 Habeas Corpus - Alien Detainee (Prisoner Petition)		
		<input type="checkbox"/> 465 Other Immigration Actions		

**V. ORIGIN**

(Place an "X" in One Box Only)

- |   |   |  |   |  |   |
|---|---|--|---|--|---|
| <input checked="" type="checkbox"/> 1 Original Proceeding | <input type="checkbox"/> 2 Removed from State Court | <input type="checkbox"/> 3 Remanded from Appellate Court | <input type="checkbox"/> 4 Reinstated or Reopened | <input type="checkbox"/> 5 Transferred from another district (specify) _____ | <input type="checkbox"/> 6 Multidistrict Litigation |
|---|---|--|---|--|---|

**VI. CAUSE OF ACTION**Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
**21 USC §§ 881(a)(4) and (6)**

Brief description of cause:

**VII. REQUESTED IN COMPLAINT:** CHECK IF THIS IS A CLASS ACTION  
UNDER F.R.C.P. 23

DEMAND \$ \_\_\_\_\_

CHECK YES only if demanded in complaint:  
**JURY DEMAND:**  Yes  No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE

SIGNATURE OF ATTORNEY OF RECORD

s/SCOTT J. CAMPBELL

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
AT LAW AND IN ADMIRALTY

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UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

APPROXIMATELY \$22,606.00 IN UNITED  
STATES CURRENCY, and

ONE 2017 LINCOLN MKZ, VEHICLE  
IDENTIFICATION NUMBER (VIN)  
3LN6L5E95HR614085, WITH ALL  
APPURTEANCES AND ATTACHMENTS  
THEREON,

Defendants.

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**WARRANT FOR ARREST IN REM**

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To: THE UNITED STATES MARSHAL  
Eastern District of Wisconsin

WHEREAS, a Verified Complaint for Civil Forfeiture *in rem* was filed on the 6<sup>th</sup> day of June, 2019, by the United States Attorney for the Eastern District of Wisconsin, which seeks the forfeiture of the above-named defendant properties pursuant to Title 21, United States Code, Sections 881(a)(4) and (6), and which prays that process issue to enforce the forfeiture and to give notice to all interested parties to appear before the court and show cause why the forfeiture should not be decreed; and due proceedings being had, that the defendant properties be condemned and forfeited to the use of the United States of America.

YOU ARE THEREFORE HEREBY COMMANDED to attach and arrest the following defendant properties, which are presently in the custody of the United States Marshal Service in

Milwaukee, Wisconsin, in the Eastern District of Wisconsin, and to detain the same until further order of this Court:

- A. Approximately \$22,606.00 in United States currency, which was seized on or about October 25, 2018, from Cardale Bland at or near 7XXX West Marine Drive, Milwaukee, Wisconsin; and
- B. One 2017 Lincoln MKZ bearing vehicle identification number 3LN6L5E95HR614085, which was seized on or about October 25, 2018, from Cardale Bland at or near 7XXX West Marine Drive, Milwaukee, Wisconsin.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2019, at Milwaukee, Wisconsin.

STEPHEN C. DRIES  
Clerk of Court

By:

\_\_\_\_\_  
Deputy Clerk

**Return**

This warrant was received and executed with the arrest of the above-named defendants.

Date warrant received: \_\_\_\_\_

Date warrant executed: \_\_\_\_\_

Name and title of arresting officer: \_\_\_\_\_

Signature of arresting officer: \_\_\_\_\_

Date: \_\_\_\_\_